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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEAH VAUGHN,

Defendants.

CR 15-332-JD

STIPULATION AND [PROPOSED] ORDER
TO CONTINUE STATUS HEARING TO
AUGUST 23, 2017 AND EXCLUDE TIME
UNDER THE SPEEDY TRIAL ACT

Date: June 28, 2017
Time: 10:30 a.m.

Ms. Vaughn is charged in an eleven count indictment with wire fraud, in violation of 18 U.S.C. § 1343, filing false claims, in violation of 18 U.S.C. § 287, and aggravated identity theft, in violation of 18 U.S.C. § 1028A. She is not in custody. The initial status hearing in this case is set for June 28, 2017. On June 2, 2017, defense counsel received approximately 24,000 pages of discovery pursuant to a protective order. *See* Dkt. 9. Defense counsel needs time to review these documents and go over them with Ms. Vaughn. Moreover, the parties have been discussing a potential resolution to the case and need more time to continue negotiating. The parties therefore request the Court continue the status hearing from June 28 to August 23, 2017 at 9:30 a.m. in the Oakland courthouse.

The parties also agree that time should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161, between June 28 and August 23, 2017. Time has already been excluded between May 18, 2017, the date of Ms. Vaughn's initial appearance, and June 28, 2017 for the effective preparation of counsel,

1 taking into account the exercise of due diligence, under 18 U.S.C. § 3161(h)(7)(B)(iv). For that same
2 reason, time should continue to be excluded as defense counsel reviews discovery and continues
3 negotiating a resolution with the government.

4 Thus, the parties request (1) this Court continue the June 28, 2017 status hearing to August 23,
5 2017; and (2) exclude time under the Speedy Trial Act.

6
7 DATED: June 26, 2017

/s/
HANNI M. FAKHOURY
Assistant Federal Public Defender

8
9 DATED: June 26, 2017

/s/
JOSE A. OLIVERA
Assistant United States Attorney

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13 **PROPOSED ORDER**

14 Based on the reasons provided in the stipulation of the parties above, the Court hereby:

- 15 1. Continues the June 28, 2017 status hearing to August 23, 2017 at 9:30 a.m., in the
16 Oakland courthouse;
- 17 2. Finds good cause to exclude the time between June 28, 2017 and August 23, 2017 from
18 the Speedy Trial Act for the effective preparation of counsel, taking into account due
19 diligence, under 18 U.S.C. § 3161(h)(7)(B)(iv).

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21 **IT IS SO ORDERED.**

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23 DATED: June 27, 2017



HONORABLE JAMES DONATO
United States District Judge